

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

SAMUEL CHARLES BOYD, JR., et al.,

Plaintiffs,

VS.

BP PRODUCTS NORTH AMERICA, INC.,

Defendant.

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CIVIL ACTION NO. 3:13-CV-175

MOTION FOR WITHDRAWAL OF COUNSEL

This Motion for Withdrawal of Counsel is brought by ANTHONY BUZBEE and CHAD PINKERTON, who are attorneys of record for STEPHANIE BERNARD, KENDRICK COOPER, EDGARDO DAVILLA, JOHN DEE, JEFFREY DUKES, ADAM FERRER, JOSE FONSECA, CARLAMETRIUS GAMBLE, ROBERT GROGAN, PABLO HERNANDEZ, JOSE HERRERA, LUIS MADRIZ, WILLIAM MCGILL, RAFEAL MORALES, OMERO PERALTA, JOSE ROMEO, TIFFANY SOWELL, JUAN TELLEZ, JESUS VALDEZ, and JUAN ZEPEDA. ANTHONY BUZBEE of The Buzbee Law Firm and CHAD PINKERTON of The Pinkerton Law Firm request the Court to grant them permission to withdraw as attorneys for the above referenced individuals in this case. In support ANTHONY BUZBEE and CHAD PINKERTON show:

Good cause exists for withdrawal of Anthony Buzbee and Chad Pinkerton, as counsel, in that they are unable to effectively communicate with the above

referenced individuals in a manner consistent with good attorney-client relations. Both attorneys and clients have come to a point in this case where it is in the best interest of the above referenced individuals for Anthony Buzbee and Chad Pinkerton to withdraw as their counsel. Moreover, numerous attempts have been made to contact above referenced individuals in regard to counsels' withdrawal by either phone or letter, but the above referenced individuals have failed to respond to counsels' correspondence. (Ex.A; Ex.B.)

A copy of this motion has been delivered to the above referenced individuals, and the last known address of:

STEPHANIE BERNARD is 3501 Ave. N. #214, Texas City, TX 77590;

KENDRICK COOPER is 6311 Dickson Ave., Texas City, TX, 77591;

EDGARDO DAVILA is 9218 Bryce Ave. North, Texas City, TX 77591;

JOHN DEE is 8273 Park Place Blvd. #19, Houston, TX 77017;

JEFFREY DUKES is 7403 Misty Morning Dr., Humble, TX 77346;

ADAM FERRER is 2020 St. North #401, Texas City, TX 77590;

JOSE FONSECA is 1212 Church St. #2, Galveston, TX 77550;

CARLAMETRIUS GAMBLE is 7506 Blue Jay Dr., Texas City, TX 77591;

ROBERT GROGAN is 3210 Hamilton Ave. #3, Dallas, TX 77210;

PABLO HERNANDEZ is 5926 Larchbrook, Houston, TX 77049;

JOSE HERRERA is 3009 Woodstone, Baytown, TX 77521;

LUIS MADRIZ is 301 E. Starling Ave., Baytown, TX 77520;

WILLIAM MCGILL is 3007 B Taylor St., La Marque, TX 77568;

RAFAEL MORALES is 1700 Bob Smith Rd. #504, Baytown, TX 77521;

OMERO PERALTA is 715 Bennett Drive, Pasadena, TX 77503;

JOSE ROMEO is 207 Larkspur, Lake Jackson, TX 77566;

TIFFANY SOWELL is 17105 Ave., La Marque, TX 77568;

JUAN TELLEZ is 1225 St. North #905, Galena Park, TX 77547;

JESUS VALDEZ is 324 Ave. North, Texas City, TX 77590, and;

JUAN ZEPEDA is 1101 Narcille St., Baytown, TX 77521.

PRAYER

ANTHONY BUZBEE and CHAD PINKERTON pray that the Court enter an order discharging them as attorney of record for STEPHANIE BERNARD, KENDRICK COOPER, EDGARDO DAVILLA, JOHN DEE, JEFFREY DUKES, ADAM FERRER, JOSE FONSECA, CARLAMETRIUS GAMBLE, ROBERT GROGAN, PABLO HERNANDEZ, JOSE HERRERA, LUIS MADRIZ, WILLIAM MCGILL, RAFAEL MORALES, OMERO PERALTA, JOSE ROMEO, TIFFANY SOWELL, JUAN TELLEZ, JESUS VALDEZ, and JUAN ZEPEDA.

Respectfully submitted,

THE BUZBEE LAW FIRM

Dated: September 23, 2013

/s/ Anthony G. Buzbee

ATTORNEY-IN CHARGE

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct of this document will be served or has been served on all interested parties in accordance with the Federal Rules of Civil Procedure on the day of September, 2013. Service on E-Filing Users will be automatically accomplished through the Notice of Electronic Filing; non-Filing Users will be served by certified mail, return receipt requested and/or via facsimile.

/s/ Anthony G. Buzbee